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ANDREA T. MARTINEZ, United States Attorney (#9313)
KARIN M. FOJTIK, Assistant United States Attorney (#7527)
Attorneys for the United States of America
185 South State Street, #400
Salt Lake City, Utah 84111
Telephone: (801) 524-5682
Facsimile: (801) 524-6924

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

VIOS.

vs.

FRANK DAVID LOPEZ-ORELLANA,

COUNT 1: 18 U.S.C. § 1201(a)(1)

(Kidnapping);

COUNT 2: 18 U.S.C. § 2251(a)
(Production of Child Pornography);
COUNT 3: 18 U.S.C. § 2423(b) (Travel
with Intent to Engage in Illicit Sexual
Conduct);

COUNT 4: 18 U.S.C. § 2422(b)
(Coercion and Enticement)

Defendant.

Case: 2:22-cr-00126
Assigned To : Kimball, Dale A.
Assign. Date : 4/13/2022

The Grand Jury charges:

COUNT 1
18 U.S.C. § 1201(a)(1)
(Kidnapping)

Between March 19, 2022, and March 22, 2022, in the District of Utah and
elsewhere,

FRANK DAVID LOPEZ-ORELLANA,

the defendant herein, in the District of Utah, did willfully and unlawfully kidnap, abduct,

seize, confine and carry away MINOR A, in interstate commerce from the State of Utah to the State of Texas, and hold for ransom, reward and otherwise, and did aid and abet, all in violation of 18 U.S.C. § 1201(a)(1) and § 2.

COUNT 2

**18 U.S.C. § 2251(a) and (e)
(Production of Child Pornography)**

Beginning in 2021 and through March 22, 2022, in the District of Utah,

FRANK DAVID LOPEZ-ORELLANA,

the defendant herein, did employ, use, persuade, induce, entice and coerce a minor, MINOR A, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and the visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and attempted to do so; all in violation of 18 U.S.C. § 2251(a) and (e).

COUNT 3

**18 U.S.C. § 2423(b)
(Travel with Intent to Engage in Illicit Sexual Conduct)**

Between March 19, 2022, and March 22, 2022, in the District of Utah,

FRANK DAVID LOPEZ-ORELLANA,

the defendant herein, did travel in interstate commerce for the purpose of engaging in any illicit sexual conduct as defined in Title 18, United States Code, Section 2423(f), with another person, to wit: MINOR A and attempted to do so; all in violation of 18 U.S.C. § 2423(b).

COUNT 4
18 U.S.C. § 2422(b)
(Coercion and Enticement)

Beginning in 2021 and through March 22, 2022, in the District of Utah,

FRANK DAVID LOPEZ-ORELLANA,

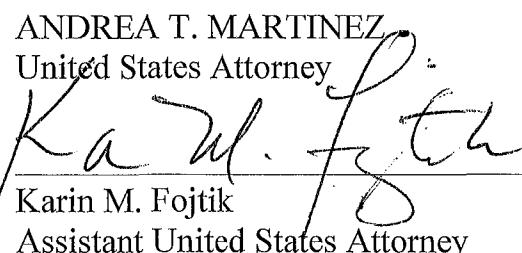
the defendant herein, using a facility or means of interstate or foreign commerce, did knowingly persuade, induce, entice, and coerce any individual who has not attained the age of 18 years, to engage in any sexual activity for which any person can be charged with a criminal offense, and attempted to do so; all in violation of 18 U.S.C. § 2422(b).

A TRUE BILL:



FOREPERSON OF THE GRAND JURY

ANDREA T. MARTINEZ
United States Attorney



Karin M. Fojtik
Assistant United States Attorney